

action occurred in the Columbia Division.

6. The plaintiff is an African-American female, 59 years of age.

7. The plaintiff has consistently performed her duties and responsibilities in a positive and professional manner, receiving positive evaluations over the course of her career with St. Leo.

8. The plaintiff served as the Director of the Sumter, South Carolina and Charleston, South Carolina campuses from 2004 until she voluntarily stepped down to the position of Assistant Director of the Sumter campus in November, 2008.

9. On September 4, 2009, the plaintiff was unfairly demoted from the position of Assistant Director to Academic Adviser for pretextual reasons.

10. On September 21, 2010, the plaintiff was terminated from her position as Academic Adviser after being pretextually disciplined on July 30, 2010.

11. That plaintiff, one of a very few African American administrators employed by St. Leo, was subjected to terms and conditions of employment different from white employees similarly situated and was held to a higher standard than such employees in terms of error toleration and assignment of tasks.

12. Plaintiff had previously reported her discriminatory treatment to her supervisors who refused to take action and in fact retaliated against her by terminating the plaintiff less than thirty (30) days after her report.

13. The plaintiff believes that those who made the decisions were biased and prejudiced against the plaintiff and that they have demonstrated discriminatory animus continuously toward the plaintiff in their day-to-day treatment of her in the workplace, including the implementation pretextual corrective action plans and was done solely to obstruct her employment opportunities at St. Leo.

**FOR A FIRST CAUSE OF ACTION
AGAINST DEFENDANT SAINT LEO UNIVERSITY
(Race Discrimination in Violation fo Title VII)**

14. The plaintiff realleges paragraphs 1 through 13 aforesaid.

15. The termination of the plaintiff and much of the treatment accorded her was disparate and discriminatory, and white employees of St. Leo similarly situated were not treated in the same manner as the plaintiff which constitutes prohibited conduct under Title VII of the 1991 Civil Rights Act and amendments thereto and amounts to unlawful race discrimination. Further, a climate of racial favoritism has existed and continues to exist within St. Leo.

16. As a direct and proximate result of the actions and inactions of St. Leo, the plaintiff has sustained a loss of salary, loss of earning capacity and future earnings, retirement and other benefits as well as reputational loss and mental and emotional suffering. The plaintiff is further entitled to an award of attorney's fees and costs and is further entitled to an award of punitive damages for the intentional and malicious action of the defendant by its agents acting within the course and scope of their employment.

**FOR A SECOND CAUSE OF ACTION
AGAINST DEFENDANT SAINT LEO UNIVERSITY
(Retaliation in Violation of Title VII)**

17. The plaintiff realleges paragraphs 1 through 16 aforesaid.

18. Once the plaintiff complained about the discriminatory treatment towards her, she was terminated less than thirty (30) days later for false and pretextual reasons; which constitutes unlawful retaliation for which remedies are provided by law.

19. The matters alleged above violate the plaintiff's civil rights under Title VII of the 1991 Civil Rights Act, and amendments thereto, and have proximately caused damages to the

plaintiff including the loss of her job, loss of earning capacity and future earnings, retirement and other benefits, as well as reputational loss and mental and emotional suffering. The plaintiff is further entitled to an award of attorney's fees and costs and is further entitled to an award of punitive damages for the intentional and malicious action of the defendant by its agents acting within the course and scope of their employment.

20. The plaintiff is entitled to relief, including back pay, front pay, actual damages and attorney's fees and costs.

WHEREFORE, plaintiff prays for judgment against the defendant St. Leo's for an award of actual damages as well as an award of punitive damages to be assessed by a jury, for attorney's fees and for the costs of this action.

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